

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

September 24, 2018

The Honorable Sarah Netburn
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 430
 New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

The Plaintiffs' Executive Committees, on behalf of all plaintiffs, write to Your Honor to request a two-week extension of the deadline to submit plaintiffs' response to defendants World Assembly of Muslim Youth-Saudi Arabia and World Assembly of Muslim Youth-International's Motion for Reconsideration of Section IV of the Court's Motion to Compel Ruling at ECF Nos. 4164-4169. For various reasons, including recent international travel spanning two weeks by several members of the PECs for multiple depositions in this litigation, conflicting schedules on the part of members of the PECs over the next week, and the need to facilitate a coordinated response regarding WAMY's recent application, plaintiffs respectfully ask to extend the response date from September 26, 2018 to October 10, 2018.

Plaintiffs have conferred with counsel for WAMY-Saudi Arabia and WAMY-International and they have indicated that the WAMY defendants do not oppose the requested extension with two provisos: First, that the WAMY defendants' reply brief would be afforded a similar two-week extension, and second, that the Court will not address the matter at the upcoming hearings on October 12, 2018. Given that the briefing will be incomplete under the proposed revised schedule, the PECs do not anticipate that the Court would hear this dispute during the October 12 hearing, and accordingly, we would not oppose the WAMY defendants' provisos.

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Plaintiffs thank Your Honor in advance for the Court's attention to this matter.

Respectfully submitted,

COZEN O'CONNOR



By: J. Scott Tarbutton, on behalf of the
Plaintiffs' Executive Committees

cc: All MDL Counsel of Record (via ECF)

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